EASTERN D	ATES DISTRICT COURT DISTRICT OF MISSOURI TERN DIVISION	DEC - 4 2013
UNITED STATES OF AMERICA,)	U. S. DISTRICT COURT E. DIST. OF MO. ST. LOUIS
Plaintiff,)	
v.) No. 4:13CR	496 CDP/TC M
JUNSEI ITO,)	
Defendant.)	

<u>INDICTMENT</u>

COUNT ONE

The Grand Jury charges that:

- 1. At all relevant times, the Defendant was a resident of St. Louis County, Missouri within the Eastern District of Missouri. At all relevant times, the Defendant served as a volunteer treasurer of St. Louis Osuwa Taiko ("SLOT") which is a non-profit cultural institution dedicated to the appreciation of Japanese ensemble drumming.
- At all relevant times, the Defendant controlled the financial accounts of SLOT with little oversight. He was allowed to write checks, pay bills and manage financial accounts of SLOT funds.
- 3. Beginning by at least July 2011 and continuing through at least March 2013, the Defendant began embezzling SLOT funds for his personal use to pay personal bills and expenses. Sometimes, the Defendant would write checks to businesses which he owed money personally and sometime he wrote checks to himself or to cash. The Defendant would also falsify the books and financial records of SLOT to cover up this scheme.

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4. Because there was little oversight of Defendant's management, the Defendant

caused bank statements for various SLOT financial accounts to be mailed to another SLOT

volunteer officer which gave some appearance of controls and regularity to the management of

SLOT funds. However, the Defendant knew the statements and papers would be turned over to

him so he could conceal them from the leadership of SLOT and continue his embezzlement.

5. In all, the Defendant embezzled approximately \$30,000 to which he was not

entitled from SLOT, all the while covering up his defalcation.

6. Between on or about July 1, 2011 and March 31, 2013, with the exact dates

unknown, within the Eastern District of Missouri and elsewhere, the Defendant,

JUNSEI ITO,

did devise a scheme and artifice to defraud another out of money and property by means of false

and fraudulent pretenses, representations and promises and for the purpose of executing the same

did send or cause to be sent material, mail and other matter by means of the United States Postal

Service, to wit: statements and other papers related to SLOT financial accounts from Reliance

Bank to an address associated with SLOT, both of which lies within the Eastern District of

Missouri.

In violation of Title 18, United States Code Section 1341.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN United States Attorney

THOMAS C. ALBUS, #46224MO Assistant United States Attorney